



## REMARKS

Claims 1-32 stand rejected. Reconsideration of the application is respectfully requested.

### Rejections Under 35 U.S.C. § 102

The Examiner rejected claims 1-32 under 35 U.S.C. § 102(e) as being anticipated by Powers et al. (U.S. Pat. No. 6,460,103). With regard to the independent claims, the Examiner stated:

Regarding claims 1, 6, 15 and 23, Powers teaches a keyboard (14) including features of the keyboard for rapidly responding to routine software requests. See col. 5, lines 9-11. Powers teaches at least one application launch Key (68) actuation of which causes a high level interrupt for opening or launching a specific user-configurable software applications. Powers also teaches that each of the keys carries an icon and further teaches rapid response keys (82, 84, 86, 88), which are additional special keys with specific purposes responding to a software request according to their assigned functions. See col. 6, lines 12-16, Fig. 3A and Fig. 4. In addition, Powers teaches the keyboard in connection to the computer console, a rapid Internet access array (70) a CPU (10), and a monitor (12). See col. 5, lines 55-57, Fig. 2 and Fig. 3A. Therefore, an identical system is described as taught by Powers et al.

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Applicants respectfully traverse this rejection. Anticipation under section 102 can be found only if a single reference shows exactly what is claimed. *Titanium Metals Corp. v. Banner*, 778 F.2d 775, 227 U.S.P.Q. 773 (Fed. Cir. 1985). For a prior art reference to anticipate under section 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). To maintain a proper rejection under section 102, a single reference must teach each and every element or step of the rejected claim. *Atlas Powder v. E.I. du Pont*, 750 F.2d 1569

(Fed. Cir. 1984). Thus, if the claims recite even one element not found in the cited references, the reference does not anticipate the claimed invention.

As described in the background of the present application, prior systems offer user configurable keyboard function keys for launching specified applications. A user can launch an application program by pressing a function key instead of selecting it from a menu bar or clicking on an icon displayed on the system monitor. Disadvantageously, these systems configure function keys by linking a particular application to a specified function key. Because the system only works for a predetermined set of applications, an application not in the predetermined set must be launched in the conventional manner. Once the system is configured, templates may be placed over the function keys to remind users of the configuration. Each time the user adds new applications or reconfigures the system, a new template must be produced to reflect the changes. Disadvantageously, present systems cannot activate URLs via the function keys.

Accordingly, the present application is directed to a method and apparatus for displaying a plurality of icons on a user configurable keyboard to allow users to launch applications and uniform resource locators (URLs) that are displayed as icons on the keyboard. The keyboard 16 includes a display screen, such as a liquid crystal display (LCD) 72, for displaying user configurable icons 74 proximate to a set of launch keys 76. Page 12, line 22 - page 13, line 2. The display screen on the keyboard 16 may comprise any commercially available display medium. Page 13, lines 2-3. The launch keys 76 may be user configurable to allow a user to program the desired application program invocation or

URL in the computer system memory circuitry. Page 13, lines 3-6. Accordingly, independent claims 1 and 6 recite a user-configurable keyboard comprising, “a display configurable to display a plurality of icons.” Further, independent claims 15 and 23 each recite, “selecting an icon from a system monitor,” “transmitting the icon from the monitor to a keyboard,” and “displaying the icon on the keyboard.”

Conversely, the Powers reference discloses a keyboard configured with unique keys that correspond to specific user feedback for a query from software. Col. 2, lines 10-15. As recognized by the Examiner, the unique keys correspond to responses to routine software requests that may require a “yes,” “no,” “cancel,” or “close-and-save” response from the user. Col. 2, lines 18-22; Col. 5, lines 9-11. Each of the dedicated and unique keys carries indicia which is molded or printed onto the key, indicating the function of that key. Col. 6, lines 12-15. To be clear, the Powers reference discloses a plurality of preset and pre-configured keys that may be used to respond to routine software queries.

Clearly, the Powers reference does not disclose a keyboard comprising a display much less a keyboard comprising a display that is configurable to display a plurality of icons, as recited in claims 1 and 6. Further, the Powers reference does not disclose selecting an icon, transmitting the icon to the keyboard, and displaying the icon on the keyboard, as recited in claims 15 and 23. As described above, the Powers reference simply discloses a keyboard with unique response keys to allow a user to respond to common software queries, such as “yes” and “no,” via the keyboard. The query responses are permanently molded or printed onto the key itself. To be clear, the Powers reference does not disclose any type of

display on the keyboard for use in conjunction with the unique function keys. Accordingly, Applicants respectfully submit that the subject matter of claims 1-32 is not anticipated by the Powers reference, since the present claims clearly recite elements not found in the cited reference.

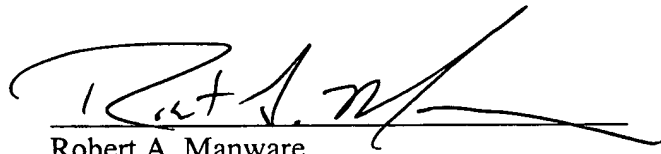
In view of the remarks set forth above, Applicants respectfully submit that the subject matter of claims 1-34 is not anticipated by the Powers reference. Accordingly, Applicants respectfully request withdrawal of the Examiner's rejection and allowance of claims 1-32.

#### **Conclusion**

In view of the remarks set forth above, Applicants respectfully request allowance of claims 1-32. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number below.

Respectfully submitted,

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